



AKRF Engineering, P.C.

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August 22, 2006

Mr. Daniel Kraft, Chief
Toxics Section
United States Environmental Protection Agency – Region II
2890 Woodbridge Avenue
Edison, New Jersey 08837-3679

Re: PCB Remediation – Risk-Based Confirmation Under 40 CFR § 761.61(c)
Flushing Industrial Park
College Point Boulevard and 40th Road, Flushing, New York

Dear Mr. Kraft:

AKRF Engineering, P.C. (AKRF) represents C.E. Flushing, LLC, a company pursuing the cleanup and redevelopment of the Flushing Industrial Park property in Flushing, Queens (the Property) under the New York State Brownfield Cleanup Program (BCP). The investigation and remediation have been performed under the guidance of the New York State Department of Environmental Conservation (NYS DEC).

On October 1, 2005, AKRF notified the United States Environmental Protection Agency (USEPA) of the intention to proceed with self-implemented cleanup of polychlorinated biphenyl (PCB) remediation waste under 40 CFR 761.61(a). As we discussed last November, and documented in our correspondence dated December 1, 2005 (attached), the excavation depth was limited as practicable below the water table. At that time, you advised that if endpoint samples revealed that soils with concentrations of PCBs above 10 parts per million (ppm) could not be excavated, we should apply for a risk-based approval. The post-excavation bottom endpoint samples in fact indicated several limited areas where PCB concentrations exceeded 10 ppm. As such, this correspondence seeks confirmation that the remediation undertaken constitutes an appropriate risk-based approach for PCB remediation under 40 CFR 761.61(c).

Background

Environmental studies conducted on the Property between 1989 and 2005 indicated the presence of soil with concentrations of PCBs in excess of 50 ppm. In addition, the investigations identified soil and groundwater with elevated levels of heavy metals, pesticides, volatile organic compounds and semi-volatile organic compounds.

From February to July 2006, remediation excavation was performed at the Property. Some limited excavation in areas previously inaccessible will be conducted later in the year; however, a majority of the excavation is completed. The remediation was performed in accordance with the following work plans approved by the NYS DEC: *Revised OU-1: Remedial Action Work Plan and Supplemental Investigation Work Plan*, August 2003; *Revised Interim Remedial Measure Work Plan*, Flushing Industrial Park, Parcels 2 and 3, September 2005; and *Remedial Action Work Plan (RAWP)*, Flushing Industrial Park,

Parcels 2 and 3, February 2006. The NYS DEC-approved RAWP for Parcels 2 and 3 consisted of the February 2006 RAWP, and the June 14, 2006 Stipulation List; a CD containing these two documents is enclosed for your reference.

As mentioned in our October 1, 2005 correspondence, NYS DEC's Site-Specific Action Level establishing the cleanup goal for PCBs on the Property was 10 ppm. The remediation on Parcel 1 consisted of the removal of delineated hotspots, storage tanks, sewers and geophysical anomalies. The remediation on Parcels 2 and 3 consisted of the excavation of the entirety of the area to the water table. The depth of excavation was limited to practicable depths, with the exception of one sheeted area where the excavation extended approximately 5 to 6 feet below the water table with dewatering.

Endpoint Sample Results

Post-excavation bottom and sidewall endpoint samples were collected, and all of the initial samples were analyzed for PCBs. The endpoint sample locations and elevations of residual contamination are shown on the attached figure, and the laboratory analytical results are provided on Tables 1, 2 and 3.

There were no final bottom endpoint samples with PCB concentrations exceeding 50 ppm. There were initially four bottom endpoint sample locations where PCB concentrations exceeded 50 ppm; however, these areas were overexcavated and the deeper sample concentrations were less than 50 ppm. Based on the endpoint samples collected at the bottom of the practicable excavation depth, there were 11 samples clustered in seven areas where PCB concentrations were greater than 10 ppm. These locations are characterized by the following final bottom endpoint samples: EP-39, EP-50, EP-51, EP-65A, EP-81, EP-84, EP-125, EP-130, EP-131, EP-152 and UST-BOTTOM EAST-1.

Post-excavation sidewall samples were collected from the northern and southern Property boundary perimeters. Nine of the sidewall samples had PCB concentrations in excess of 10 ppm, and five of these samples had a concentration greater than 50 ppm. These sidewall samples were taken to provide the NYS DEC with information representative of off-site conditions; however, off-site remediation is not required by the Property owner under the BCP.

Discussion of Risk

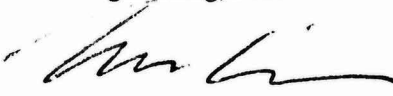
The risk that residual contamination could impact human health or the environment has been minimized, based on the following factors:

- The areas with residual concentrations of PCBs between 10 and 50 ppm are limited in size, and are all located at least 1 foot below the water table. In addition, the remedial investigations on the Property indicated that PCB concentrations in soil decrease significantly with depth.
- The areas with residual concentrations of PCBs between 10 and 50 ppm were backfilled with a minimum of two (2) feet of clean fill that meets the Site-Specific Action Level criteria. As part of the final development, all areas of residual contamination will be covered with at least four (4) feet of clean fill and/or concrete slabs associated with the new building. Outside of the planned building footprint, a geotextile fabric demarcation layer was placed at the base of the excavation prior to backfilling.
- All post-remediation construction work will be performed in accordance with a Construction Health and Safety Plan. If construction is to disturb the residual contamination, appropriate health and safety protocols will be followed and any excavated soil will be stockpiled separately and characterized for proper off-site disposal.
- Institutional controls will be implemented to ensure that no unacceptable exposure to residual contamination will occur in the long-term. An environmental easement will be filed to ensure the following: any future excavation activities are conducted in accordance with a Site Management Plan


(forthcoming), the soil cap is inspected and maintained, and groundwater on the Property is not used for any purpose.

We request your confirmation that the remediation performed on the Property constitutes an appropriate risk-based approach to PCB remediation. Please call Marcus at 646-388-9527 or Kate at 646-388-9525 if you have any questions.

Sincerely,
AKRF Engineering, P.C.



Marcus Simons
Senior Vice President



Kathleen Brunner
Senior Environmental Scientist

Attachments: December 1, 2005 Correspondence from AKRF to USEPA
Figure 1 – Residual PCB Contamination Plan
Tables 1, 2 and 3 – Endpoint Sample Analytical Results, Parcel 1; Endpoint Sample
Analytical Results, Parcels 2 and 3; and UST Endpoint Analytical Results for
PCBs
CD Containing February 2006 *Remedial Action Work Plan* for Parcels 2 and 3 and June
14, 2006 Stipulation List

cc: Vivian Chin – EPA Region 2, Edison, NJ

cc (without CD):

Daniel Walsh, Ioana Munteanu-Ramnic, Vadim Brevdo – NYSDEC Region 2
Harvey Schultz, Michael Brenner – C.E. Flushing, LLC
Mark Chertok, Jennifer Coghlan – Sive Paget & Riesel



AKRF Engineering, P.C.
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December 1, 2005

Mr. Alan J. Steinberg
Regional Administrator
Environmental Protection Agency, Region 2
290 Broadway
New York, NY 10007-1866

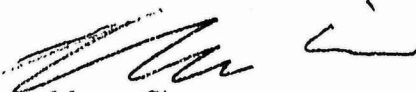
Re: PCB Remediation Notification - 40 CFR § 761.61(a)
Flushing Industrial Park, College Point Boulevard and 40th Road, Flushing, New York

Dear Mr. Steinberg:

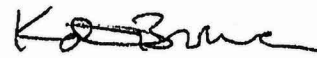
AKRF Engineering, P.C. (AKRF) is in receipt of your letter dated November 15, 2005 regarding the self-implementing cleanup to be undertaken at the above-referenced site. We appreciate EPA's review and approval of the proposed remediation. In your letter you noted: *"In summary, all PCB contaminated soils with concentrations above 10 ppm will be excavated and sent off-site for disposal"*. Although the goal of the remediation is the removal of all soils with PCB concentrations above 10 ppm and the area where the majority of PCBs identified below the water table will be sheeted to enable full removal, there are other limited areas where it may prove technically infeasible to remove all soils below the water table with PCB concentrations above 10 ppm. We contacted Mr. Daniel Kraft (EPA-Edison) on November 30, 2005 to discuss this possibility and to determine whether any further action would be required. Mr. Kraft has advised that should such a situation occur, AKRF should submit an application for a risk-based approval in accordance with 40 CFR § 761.61(c). As discussed with Mr. Kraft, the engineering controls included in the remedial plan will cap the entire site with either impervious surfaces or two feet of clean fill and will ensure that no unacceptable exposure to such soils would occur.

Please call Kate Brunner (646-388-9525) or Marcus Simons (646-388-9527) if you have any questions.

Sincerely,
AKRF Engineering, P.C.

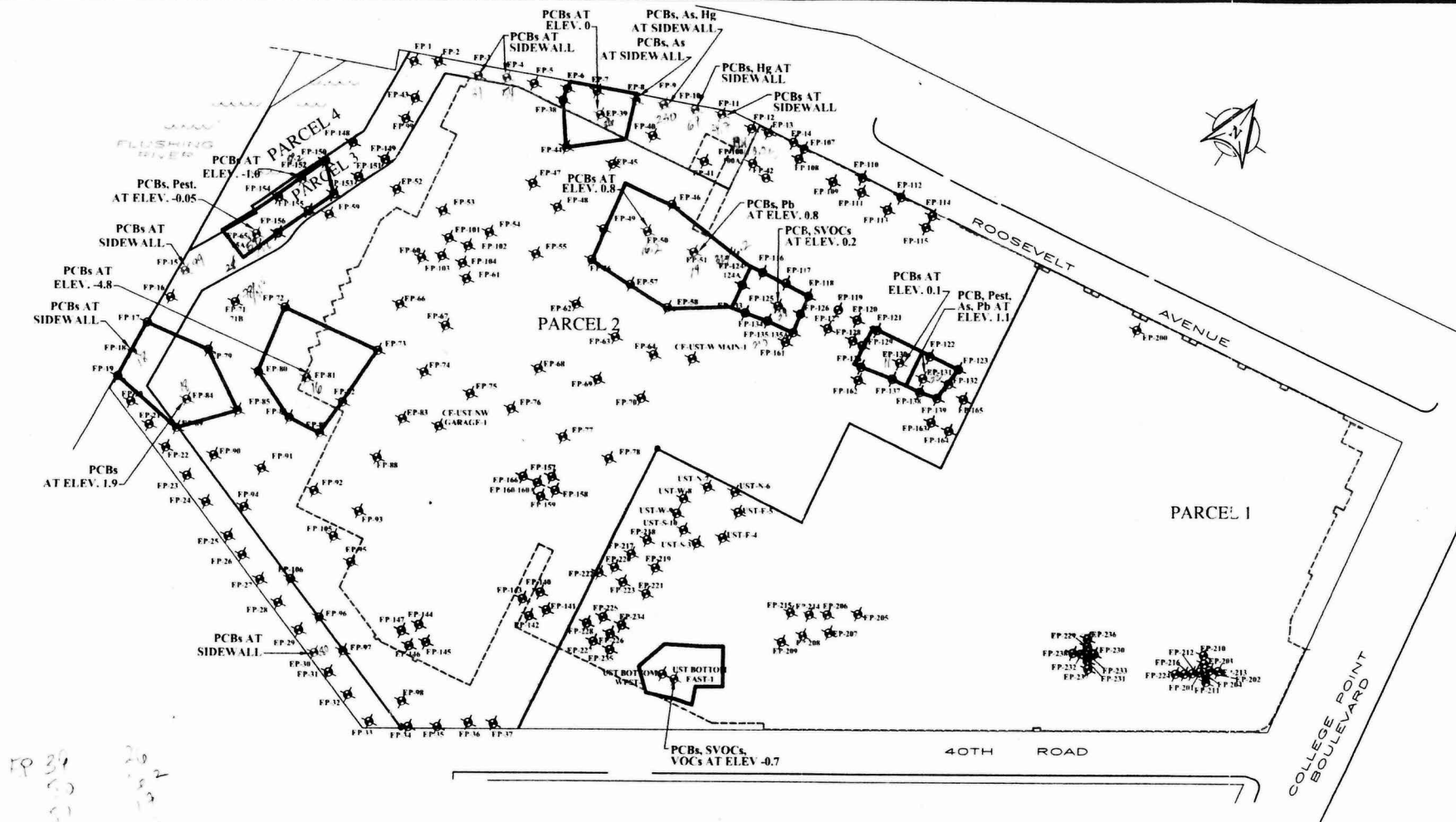


Marcus Simons
Senior Vice President



Kathleen Brunner
Senior Environmental Scientist

cc: Mr. Daniel Kraft/Ms. Vivian Chin/Mr. Kenneth Stoller – EPA Region 2, Edison
Mr. Dan Walsh/Ms. Ioana Munteanu-Ramnic/Mr. Vadim Brevdo – NYSDEC Region 2
Mr. Mike Brenner/Mr. Harvey Schultz – C.E. Flushing, LLC
Mr. Mark Chertok/Ms. Jennifer Coghlan – Sive Paget & Riesel



Handwritten notes in the bottom left corner of the map area:

EP 30
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LEGEND:

- FORMER BUILDING LINE
- - - PLANNED DEVELOPMENT FOOTPRINT
- APPROXIMATE EXTENT OF RESIDUAL PCB CONTAMINATION (>10 ppm)
- ★ ENDPOINT SAMPLE LOCATION
- ★ SOIL PCB CONCENTRATIONS >10 ppm (SSAL)
- ★ SOIL PCB CONCENTRATIONS > 50 ppm

FLUSHING INDUSTRIAL PARK FLUSHING, NEW YORK

RESIDUAL PCB CONTAMINATION PLAN

DATE
08.16.06

SCALE
1"=100'

PROJECT No.
30141

FIGURE No.
1

Flushing Industrial Park, Parcel 1

Table 1
Endpoint Sample Analytical Results

ENDPOINT SAMPLE NAME	DATE COLLECTED	SAMPLE LOCATION	PARAMETER (ppm)									
			PCBs 10	Pest. 1, or TAGM	Total SVOCs 100	VOCs TAGM	Arsenic 24	Cadmium 10	Lead 500	Mercury 4	Silver 100	Reac. Cyanide Haz. Criterion
EP-200	2/22/2006	East sidewall of MW-18 hotspot					3.4					
EP-201	2/23/2006	WC-37B hotspot area				AIH<TAGM			643			
EP-202	2/23/2006	WC-37B hotspot area				AIH<TAGM			1480			
EP-203	2/23/2006	WC-37B hotspot area				AIH<TAGM			667			
EP-204	2/23/2006	WC-37B hotspot area				AIH<TAGM			968			
EP-205	3/3/2006	WC-42 hotspot area							102			
EP-206	3/3/2006	WC-42 hotspot area							122			
EP-207	3/3/2006	WC-42 hotspot area							908			
EP-208	3/3/2006	WC-42 hotspot area							306			
EP-209	3/3/2006	WC-42 hotspot area							1110			
EP-210(N)	3/10/2006	North sidewall of WC-37B hotspot (re-excavated)							466			
EP-211(S)	3/10/2006	South sidewall of WC-37B hotspot area (re-excavated)							231			
EP-212(W)	3/10/2006	West sidewall of WC-37B hotspot area (re-excavated)							618			
EP-213(E)	3/13/2006	East sidewall of WC-37B hotspot area (re-excavated)							429			
EP-214	3/24/2006	WC-42 hotspot area (re-excavated)							75.2			
EP-215	3/24/2006	WC-42 hotspot area (re-excavated)							127			
EP-216(W)	4/13/2006	West sidewall of WC-37B hotspot (re-excavated)							613			
EP-217(W)	4/13/2006	West sidewall of hotspot on grid cell F5	0.052	AIH <1.0	31	AIH<TAGM	15.7	ND	201	0.24	ND	ND
EP-218(N)	4/13/2006	North sidewall of hotspot on grid cell F5	3.3	AIH <1.0	21	AIH<TAGM	12.8	1.1	134	1.4	ND	ND
EP-219(E)	4/13/2006	East sidewall of hotspot on grid cell F5	0.26	AIH <1.0	2	AIH<TAGM	1.3	ND	19.5	0.068	ND	ND
EP-220	5/8/2006	Northwest sidewall of hotspot on grid cell F5	0.023	AIH <1.0	2.48	AIH<TAGM	ND	ND	15.5	0.033	ND	ND
EP-221	5/8/2006	East sidewall of hotspot on grid cell F5	3.4	AIH <1.0	600.5	AIH<TAGM	4.2	ND	110	0.42	0.58	ND
EP-222	5/8/2006	West sidewall of hotspot on grid cell F5	3.2	AIH <1.0	22.51	AIH<TAGM	2	ND	123	0.19	ND	ND
EP-223	5/8/2006	Bottom of hotspot on grid cell F5	0.079	AIH <1.0	1.54	AIH<TAGM	11.8	ND	36.4	0.071	ND	ND
EP-224	5/8/2006	WC-37B hotspot area (re-excavated)							28.4	0.066		
EP-225 (6')	7/26/2006	North sidewall of SB-76 hotspot	0.15					ND	441	2.2		
EP-226 (6')	7/26/2006	East sidewall of SB-76 hotspot	ND					ND	329	0.067		
EP-227 (6')	7/26/2006	South sidewall of SB-76 hotspot	0.049					ND	44.8	0.083		
EP-228 (6')	7/26/2006	West sidewall of SB-76 hotspot	0.22					ND	51.7	0.091		
EP-229 (1.5')	7/27/2006	North sidewall of YAK-B-37 hotspot							647			
EP-230 (1.5')	7/27/2006	East sidewall of YAK-B-37 hotspot							266			
EP-231 (1.5')	7/27/2006	South sidewall of YAK-B-37 hotspot							677			
EP-232 (1.5')	7/27/2006	West sidewall of YAK-B-37 hotspot							984			
EP-233 (2')	7/27/2006	Bottom endpoint of YAK-B-37 hotspot							1340			
EP-234 (6')	7/31/2006	North sidewall - extension of SB-76 hotspot	0.31		5.8	AIH<TAGM						
EP-235 (6')	7/31/2006	South sidewall - extension of SB-76 hotspot	0.06		0.65	AIH<TAGM						

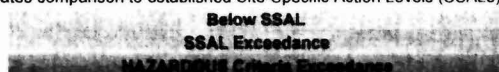
Notes: "ND" indicates not detected above the method detection limit

Some laboratory results may be preliminary. Updated results will be included in subsequent reports.

See laboratory analytical reports for complete analytical results, with flags/qualifiers.

Blank space indicates sample not analyzed for that parameter.

Color coding indicates comparison to established Site-Specific Action Levels (SSALs):



Flushing Industrial Park, Parcels 2 and 3

Table 2

Endpoint Sample Analytical Results

ENDPOINT SAMPLE NAME AND DATE			Concentration (ppm)							
			PCBs	Pesticides	VOCs	SVOCs	Arsenic	Cadmium	Lead	Mercury
			10	1, or TAGM	TAGM	100	24	10	500	4
EP-1 (3')	sidewall	5/31/2006	0.29						36.6	
EP-2 (3')	sidewall	6/8/2006	2.3						555	
EP-3 (3')	sidewall	6/9/2006	31							
EP-4 (4.5')	sidewall	6/7/2006	54							
EP-5 (3')	sidewall	6/7/2006	2.26							
EP-6 (3')	sidewall	6/5/2006	2.02							
EP-7 (3')	sidewall	6/2/2006	0.3							
EP-8 (2')	sidewall	5/24/2006	17				73.3			3.54
EP-9 (2')	sidewall	5/24/2006	230				33.8			5.04
EP-10 (2')	sidewall	5/24/2006	69				6.3			20.4
EP-11 (2')	sidewall	5/24/2006	24.7							0.698
EP-12 (3')	sidewall	6/23/2006	7.2	All <1.0	All<TAGM					
EP-13 (3')	sidewall	6/23/2006	4.7	All <1.0	All<TAGM					
EP-14 (4')	sidewall	5/23/2006	ND	ND	All<TAGM					
EP-15	sidewall	5/10/2006	99							
EP-16	sidewall	5/10/2006	1.5							
EP-17 (2.5')	sidewall	6/21/2006	2.5							
EP-18 (2.5')	sidewall	6/21/2006	18							
EP-19 (2.5')	sidewall	6/21/2006	5.6							
EP-20 (2'-3')	sidewall	5/9/2006	1.7							
EP-21 (3')	sidewall	5/9/2006	0.43							
EP-22 (3')	sidewall	5/17/2006	0.029							
EP-23 (3')	sidewall	5/9/2006	0.032							
EP-24 (3')	sidewall	5/9/2006	0.091							
EP-25 (3')	sidewall	5/9/2006	0.2	All <1.0			8			
EP-26 (3')	sidewall	3/27/2006	2.6	All <1.0	All<TAGM					
EP-27(3')	sidewall	3/27/2006	1.6		All<TAGM					
EP-28 (2')	sidewall	4/7/2006	0.95		All<TAGM					
EP-29 (3')	sidewall	3/23/2006	10		All<TAGM					
EP-30 (4')	sidewall	3/23/2006	80		All<TAGM					
EP-31 (3')	sidewall	3/27/2006	0.0097							
EP-32 (3')	sidewall	3/23/2006	ND		All<TAGM					
EP-33 (3')	sidewall	3/23/2006	0.19		All<TAGM					
EP-34 (2')	sidewall	3/24/2006	2.6							
EP-35 (3')	sidewall	3/24/2006	0.028							
EP-36 (3')	sidewall	3/24/2006	ND							
EP-37 (2')	sidewall	3/24/2006	0.84							
EP-38 (3')	bottom	6/5/2006	9.7							
EP-39 (4.5')	bottom	5/25/2006	26							
EP-40 (5')	bottom	5/24/2006	0.095							0.03
EP-41 (4.5')	bottom	5/23/2006	0.15							
EP-42 (6')	bottom	5/23/2006	0.17	ND						
EP-43 (6.5')	bottom	6/9/2006	1.8						88.6	

Flushing Industrial Park, Parcels 2 and 3

Table 2

Endpoint Sample Analytical Results

ENDPOINT SAMPLE NAME AND DATE			Concentration (ppm)							
			PCBs 10	Pesticides 1, or TAGM	VOCs TAGM	SVOCs 100	Arsenic 24	Cadmium 10	Lead 500	Mercury 4
EP-44 (3.5')	bottom	6/5/2006	7.8							
EP-45(4.5')	bottom	5/25/2006	0.2							
EP-46(4.5')	bottom	5/25/2006	0.15							
EP-47 (4')	bottom	6/6/2006	0.044							
EP-48 (4.5')	bottom	6/1/2006	0.39							
EP-49 (4')	bottom	5/26/2006	ND							
EP-50 (4')	bottom	5/22/2006	16.2							
EP-51 (4')	bottom	5/22/2006	19	4,4-DDT 1.1; others <1.0		95.6	4.3		711	0.64
EP-52 (4')	bottom	6/12/2006	0.25							
EP-53 (4.5')	bottom	6/13/2006	0.034							
EP-54 (4.5')	bottom	6/6/2006	0.05							
EP-55 (4')	bottom	6/6/2006	5.1							
EP-56 (5')	bottom	5/26/2006	ND							
EP-57(4')	bottom	5/18/2006	2.17							
EP-58 (4')	bottom	5/12/2006	1.25							
EP-59 (4.5')	bottom	6/12/2006	0.024							
EP-60 (4.5')	bottom	6/13/2006	ND							
EP-61 (5')	bottom	6/20/2006	0.046							
EP-62 (5')	bottom	5/26/2006	0.023							
EP-63 (4')	bottom	5/18/2006	0.71							
EP-64 (4')	bottom	5/12/2006	ND		All<TAGM					
EP-65 (5.5')	bottom	5/8/2006	69	Dieldrin 1.7; 4,4-DDT 7.1		462				
EP-65A (6')	bottom	5/12/2006	28	Dieldrin 1.4		2.02				
EP-66 (5')	bottom	6/20/2006	0.36							
EP-67 (5')	bottom	6/20/2006	ND							
EP-68 (5')	bottom	5/30/2006	0.014							
EP-69 (4')	bottom	5/18/2006	7.8							
EP-70 (4')	bottom	5/16/2006	0.64							
EP-71 (5')	bottom	5/11/2006	78							
EP-71B (6.5')	bottom	5/19/2006	0.54							
EP-72 (4')	bottom	6/9/2006	0.1							
EP-73 (5')	bottom	6/20/2006	0.036							
EP-74 (5')	bottom	6/20/2006	0.0062							
EP-75 (5.5')	bottom	6/20/2006	0.0074			0.479				
EP-76 (5.5')	bottom	7/17/2006	0.12			0.2				
EP-77 (5.5')	bottom	7/19/2006	ND							
EP-78 (4.5')	bottom	7/24/2006	0.01							
EP-79 (5')	bottom	5/11/2006	ND							
EP-80 (3.5')	bottom	5/16/2006	2.2							
EP-81 (9')	bottom	5/25/2006	16							
EP-82 (9')	bottom	6/15/2006	0.069							
EP-83 (9')	bottom	6/15/2006	0.077		All<TAGM					

Flushing Industrial Park, Parcels 2 and 3

Table 2

Endpoint Sample Analytical Results

ENDPOINT SAMPLE NAME AND DATE			Concentration (ppm)						
			PCBs	Pesticides	VOCs	SVOCs	Arsenic	Cadmium	Lead
			10	1, or TAGM	TAGM	100	24	10	500
EP-84 (3')	bottom	5/17/2006	18						
EP-85 (3')	bottom	5/17/2006	0.025						
EP-86 (3.5')	bottom	5/16/2006	0.3						
EP-87 (9')	bottom	6/12/2006	ND		All<TAGM				
EP-88 (9')	bottom	6/6/2006	0.012		All<TAGM				
EP-89 (5')	bottom	5/15/2006	1.7						
EP-90 (5')	bottom	5/15/2006	1.04						
EP-91 (4.5')	bottom	5/12/2006	ND						
EP-92 (9')	bottom	5/31/2006	ND						
EP-93 (9')	bottom	5/24/2006	ND						
EP-94 (5')	bottom	5/10/2006	1.7	All <1.0			25.7		
EP-95 (9')	bottom	5/26/2006	0.22		All<TAGM				
EP-96 (10.5')	bottom	5/1/2006	0.07		All<TAGM				
EP-97 (9.5')	bottom	5/24/2006	ND		All<TAGM				
EP-98 (5')	bottom	3/24/2006	0.095						
EP-99 (4')	bottom	6/8/2006	0.32						6.3
EP-100 (6')	bottom	5/23/2006	19.1	All <1.0					
EP-100A (8')	bottom	6/16/2006	0.063	All <1.0					
EP-101 (8')	bottom	6/14/2006	0.35						
EP-102 (7')	bottom	6/14/2006	0.017						
EP-103 (8')	bottom	6/14/2006	0.059						
EP-104 (6')	bottom	6/14/2006	0.022						
EP-105 (9')	bottom	5/31/2006	ND		All<TAGM				
EP-106 (12')	bottom	5/1/2006	0.0086		All<TAGM				
EP-107 (5')	sidewall	7/18/2006	2.8						273
EP-108 (5')	sidewall	7/18/2006	0.39						225
EP-109 (5')	sidewall	7/18/2006	ND						10.9
EP-110 (3.5')	sidewall	7/18/2006	ND			0.411			13.7
EP-111 (3.5')	sidewall	7/18/2006	ND			0.14			
EP-112 (5')	sidewall	7/17/2006	1.6			3.12	ND		
EP-113 (5')	sidewall	7/17/2006	0.42			0.44	5		
EP-114 (5')	sidewall	7/17/2006	0.95				ND		
EP-115 (5')	sidewall	7/17/2006	0.42				ND		
EP-116 (5')	sidewall	6/26/2006	0.097	All <1.0		1.08	ND		24.9
EP-117 (5')	sidewall	6/26/2006	0.16	All <1.0		1.9	ND		304
EP-118 (5')	sidewall	6/26/2006	ND	All <1.0		15.96	14.4		196
EP-119 (5')	sidewall	6/26/2006	0.089				12.1	ND	221
EP-120 (5')	sidewall	6/26/2006	0.35				8.8		181
EP-121 (5')	sidewall	6/26/2006	0.061	All <1.0			ND	ND	220
EP-122 (5')	sidewall	6/28/2006	ND	All <1.0				ND	
EP-123 (5')	sidewall	6/26/2006	0.26	All <1.0				ND	
EP-124 (6.5')	bottom	6/26/2006	320	Dieldrin 1.4; 4,4-DDT 3.6		133.33	48.2		522

Flushing Industrial Park, Parcels 2 and 3

Table 2
Endpoint Sample Analytical Results

ENDPOINT SAMPLE NAME AND DATE			Concentration (ppm)							
			PCBs	Pesticides	VOCs	SVOCs	Arsenic	Cadmium	Lead	Mercury
			10	1, or TAGM	TAGM	100	24	10	500	4
EP-124A (7.5')	bottom	7/20/2006	6.2	All <1.0 or no TAGM		8.12	51.5		98.7	1
EP-125 (5.5')	bottom	6/26/2006	39	4,4-DDT 1.1 (<TAGM); others <1.0		717	15.6		292	2.61
EP-126 (5.5')	bottom	6/26/2006	3.6						212	3.3
EP-127 (5.5')	bottom	6/26/2006	5.2						83	6.9 (TCLP <0.0009 mg/l)
EP-128 (5.5')	bottom	6/26/2006	2.4	All <1.0				ND	246	1.4
EP-129 (5.5')	bottom	6/26/2006	1.4	All <1.0				ND		
EP-130 (5.5')	bottom	6/26/2006	11	All <1.0				ND	457	
EP-131 (5.5')	bottom	6/26/2006	22	4,4-DDD 1.8; 4,4-DDT 3.0			31.5	2.5	610	
EP-132 (5.5')	sidewall	6/26/2006	0.15				24.6			
EP-133 (7')	bottom	6/28/2006	ND	All <1.0		0.71	ND		9.2	ND
EP-134 (5')	sidewall	6/26/2006	0.12	All <1.0		13.03	23.7		188	1.28
EP-135 (5')	sidewall	6/26/2006	210	All <1.0		124.84	33.1		819	8.81 (TCLP <0.0009 mg/l)
EP-135A (7')	bottom	7/21/2006	0.36			0.16	10.9		164	0.59
EP-136 (5')	sidewall	6/26/2006	7.5			24.5			1070	
EP-137 (5')	sidewall	6/26/2006	3.02						114	
EP-138 (5')	sidewall	6/26/2006	0.45				6.6		79.1	
EP-139 (5.5)	sidewall	6/26/2006	0.37				24.2			
EP-140 (6.5')	sidewall	7/20/2006	ND				9.5			
EP-141 (6.5')	sidewall	7/20/2006	ND				12.9			
EP-142 (6.5')	sidewall	7/20/2006	0.034				ND			
EP-143 (6.5')	sidewall	7/20/2006	ND				23.7			
EP-144 (6.5')	sidewall	7/21/2006	ND						8.7	
EP-145 (6.5')	sidewall	7/21/2006	0.8						50.2	
EP-146 (6.5')	sidewall	7/20/2006	ND						7.7	
EP-147 (6.5')	sidewall	7/21/2006	ND						20.5	
EP-148 (6')	bottom	7/31/2006	0.44							
EP-149 (6.5')	bottom	7/27/2006	0.75							
EP-150 (6')	bottom	7/26/2006	6							
EP-151 (6.5')	bottom	7/27/2006	1.2							
EP-152 (6')	bottom	7/26/2006	19.2							
EP-153 (6')	bottom	7/26/2006	ND							
EP-154 (5.5')	bottom	7/24/2006	0.055							
EP-155 (6')	bottom	7/24/2006	0.014							
EP-156 (5.5')	bottom	7/24/2006	0.026							
EP-157(6.5')	sidewall	7/20/2006	ND						234	
EP-158 (6.5')	sidewall	7/20/2006	ND						98.6	
EP-159 (6.5')	sidewall	7/20/2006	ND						9.2	
EP-160 (6')	sidewall	7/20/2006	ND						583	
EP-160A (7.5')	bottom	7/27/2006							323	

Flushing Industrial Park, Parcels 2 and 3

Table 2

Endpoint Sample Analytical Results

ENDPOINT SAMPLE NAME AND DATE			Concentration (ppm)						
			PCBs	Pesticides	VOCs	SVOCs	Arsenic	Cadmium	Lead
			10	1, or TAGM	TAGM	100	24	10	500
EP-161 (7')	sidewall	7/21/2006	1.9	All <1.0 or no TAGM		32.37	13.2		114
EP-162 (6.5')	sidewall	7/24/2006							11.8
EP-163 (5')	sidewall	7/25/2006					7		
EP-164 (5')	sidewall	7/26/2006					6.5		
EP-165 (5')	sidewall	7/26/2006					9.7		
EP-166 (6')	sidewall	7/27/2006							53.3

Notes:

"ND" indicates not detected above the method detection limit

See laboratory analytical reports for complete analytical results with qualifiers. Some results are preliminary.

Blank space indicates sample not analyzed for that parameter.

Color coding indicates comparison to the indicated Site-Specific Action Levels (SSALs):

Below SSAL

SSAL Exceedance

HAZARDOUS Criteria Exceedance